

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DISTRICT

OLIVIA Y, et al

PLAINTIFFS

vs.

CIVIL ACTION NO. 3:04cv251-TSL-FKB

PHIL BRYANT, et al

DEFENDANTS

DEFENDANTS' MOTION FOR EXTENSION OF TIME

Defendants respectfully request an extension of time to respond to the Plaintiffs' *Memorandum of Law In Opposition to Defendants' Motion for Relief Under the 2nd Modified Settlement Agreement and Reform Plan and Fed. R. Civ P. 60(b)* [Doc. # 772] by ten days, from August 14, 2018 to August 24, 2018.

This extension is sought for good cause. Defendants have conflicts and public service obligations during this period. A ten-day extension is necessary to allow Defendants to research and present a reply to Plaintiffs' *Memorandum of Law In Opposition* and to allow adequate time for review within MDCPS and the Governor's Office.

Plaintiffs requested an extension from Defendants for the filing of their Reply Brief [Doc # 767] to *Defendants' Response to Motion for Contempt* [Doc #739] and were granted a ten-day extension from July 10 to July 20, 2018. Plaintiffs also filed their response to Defendants' *Motion for 60(b) Relief* [Doc. #772] on August 7, 2018 after seeking agreement from Defendants for a 21-day extension. The Defendants agreed with both of Plaintiffs requests and unopposed motions for extensions were accordingly filed with the Court. The Court granted both extension requests.

Defendants sought an equal ten-day extension from Plaintiffs for Defendants' Reply Brief to Plaintiffs' *Memo of Law in Opposition* [Doc #772]. Plaintiffs have informed Defendants that they oppose this extension.

Respectfully submitted, this the 8th day of August, 2018,

PHIL BRYANT, as Governor of the State of Mississippi;
JESS H. DICKINSON, as Commissioner of Mississippi
Department of Child Protection Services; and TRACY
MALONE, as Deputy Commissioner of Child Welfare,
Mississippi Department of Child Protection Services

By: /s/ James L. Jones (MSB #3214)

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CERTIFICATE OF SERVICE

I, James L. Jones, do hereby certify that on August 8, 2018, I electronically filed a true and correct copy of the foregoing document with the Clerk of Court using the ECF system which sent notification of such to counsel as follows:

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SO CERTIFIED, this 8th day of August, 2018.

/s/ James L. Jones .